



Center for Disability Advocacy Rights (CeDAR), Inc.

100 Lafayette Street, 3rd Floor

New York, New York 10013

Tel. (212) 979-7575

Fax (212) 979-8778

CHRISTOPHER J. BOWES
EXECUTIVE DIRECTOR
DIRECT DIAL (212) 979-7575

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/7/2020

January 7, 2020

MEMO ENDORSED

Via ECF

Hon Barbara C. Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Martinez v. Saul
1:19-cv-06515-BCM

Dear Judge Moses:

As the attorney for the above plaintiff in the above captioned case, I write to request approval of the proposed briefing schedule. This is plaintiff's second request for an extension of time and is made with the consent of, and in consultation with, opposing AUSA Joseph Pantoja.

I seek an extension of time due to personal reasons. My father died in December after a long illness and I have had to take time off to tend to his services and my mother's needs over the past several weeks. I remain behind schedule on this and other cases. With the kind consent of opposing counsel, AUSA Joseph Pantoja, I respectfully request that the Court extend and approve the following revised briefing schedule:

January 14, 2020	Plaintiff's settlement letter
February 13, 2020	Stipulation of Dismissal or No Settlement Joint Letter
March 16, 2020	Plaintiff's Motion for Judgment on the Pleadings
May 15, 2020	Defendant's Motion for Judgment on the Pleadings
June 4, 2020	Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Application GRANTED. SO ORDERED.

Barbara Moses, U.S.M.J.
January 7, 2020

Very truly yours,

/s/ Christopher J. Bowes
Christopher J. Bowes, Esq